UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

KEVIN FORTE,)	
)	
Plaintiff,)	
)	06 C 3829
VS-)	Judge Amy St. Eve
)	Magistrate Judge Valdez
CITY OF CHICAGO, a municipal corporation,)	
Officer Chris Ghulston, Star No. 19586,)	
Officer T. Gaines, Star No. 5317,)	
)	
Defendants.)	

MOTION FOR JUDGMENT PURSUANT TO RULE 68

Now comes the Plaintiff Kevin Forte, by his attorneys, Gregory X. Gorman and James A. Stamos, and moves for entry of judgment in his favor and against the Defendants. In support of said motion Plaintiff states as follows:

- 1. On January 14, 2008 the Defendants City of Chicago, Teronda Gaines and Chris Gholston tendered a joint Rule 68 Offer of Judgment to Plaintiff (through counsel) in the amount of \$15,001.00, plus reasonable attorney's fees and costs in an amount to be determined by the court. (Exhibit A)
- 2. January 20, 2008, Plaintiff's counsel served Defendant's counsel with a timely Acceptance of Offer Judgment by both fax transmission and regular mail. (Exhibit B)
- 3. Plaintiff moves for entry of Judgment herein and will file a Petition for reasonable attorney fees and costs by March 5, 2008, as per this court's previous order.

WHEREFORE Plaintiff moves for entry of judgment in his favor and against Defendant's City of Chicago, Teronda Gaines and Chris Gholston jointly in the amount of \$15,001.00, plus reasonable attorney fees and costs.

/s/ Gregory X. Gorman
One of the Attorneys for Plaintiff

GREGORY X. GORMAN 542 S. Dearborn St. Suite 1060 Chicago, IL 60605 312-332-4240 JAMES A. STAMOS 61 W. Superior St. Chicago, IL 60610 312-243-1722

CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing Motion for Entry of Judgment on the following listed attorneys for Defendants via the U.S. District Court's Electronic Case Filing System, on February 29, 2008.

/s/ Gregory X. Gorman
One of the Attorneys for Plaintiff

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